

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SHANELLE N. HORTON, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

FARMERS INSURANCE EXCHANGE,  
TRUCK INSURANCE EXCHANGE,  
FIRE INSURANCE EXCHANGE,  
MID-CENTURY INSURANCE COMPANY,  
FARMERS NEW WORLD LIFE  
INSURANCE COMPANY, COAST  
NATIONAL INSURANCE COMPANY,  
FOREMOST INSURANCE COMPANY,  
FOREMOST SIGNATURE INSURANCE  
COMPANY, and FOREMOST PROPERTY  
AND CASUALTY INSURANCE COMPANY,

Defendants.

Case No. 1:17-cv-00894

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendants Farmers Insurance Exchange, Coast National Insurance Company, Farmers New World Life Insurance Company, Fire Insurance Exchange, Foremost Insurance Company, Foremost Property and Casualty Insurance Company, Foremost Signature Insurance Company, Mid-Century Insurance Company and Truck Insurance Exchange (collectively, “Defendants”) Motion for Costs and Fees, the Attorney Declaration of Randall A. Hack in Support Thereof, dated December 15, 2017, the Declaration of Anne Wright in Support Thereof, dated December 15, 2017, and all prior pleadings, orders and proceedings had herein, Defendants will hereby move this Court, before the Honorable Judge Robert W. Lehrburger, United States Magistrate Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an order pursuant to Federal Rule of Civil Procedure

16(f) awarding Defendants certain costs and fees, and for such other and further relief as deemed just and proper by this Court.

Pursuant to the Court's Local Rules, any opposing affidavits and answering memoranda shall be served within fourteen days after service of the moving papers, and any reply affidavits and memoranda of law shall be served within seven days after service of the answering papers.

Dated: New York, New York  
December 15, 2017

LOCKE LORD LLP

/s/ Randall A. Hack

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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I, SAMANTHA INGRAM, an attorney, hereby certify that on the 15th day of December, 2017, a true and correct copy of the foregoing *NOTICE OF MOTION* was served via ECF on all parties entitled to notice.

/s/ Samantha Ingram  
Samantha Ingram